



# NORLITE CORPORATION

---

628 SO. SARATOGA STREET  
PO BOX 684  
COHOES, NY 12047  
PHONE: (518) 235-0401  
FAX: (518) 235-0233

June 05, 2012

Mr. William J. Clarke  
Regional Permit Administrator  
New York State Department of Environmental Conservation  
Region 4  
1130 North Westcott Road  
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng  
Air Compliance Branch  
United States Environmental Protection Agency  
Region 2  
290 Broadway  
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report  
Kiln 1: 05/21/12- 06/05/12  
Kiln 2: 05/21/12- 06/05/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 05/21/12 thru 06/05/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the LGF flow monitor and the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. Review of the data indicates high LGF Line pressure makes controlling fuel flow difficult with either a pump or with valves. In a majority of the LGF Span and Back Chamber cutoffs, high LGF pressure or sudden changed in LGF Line Pressure were the cause for the cutoff. Norlite is still processing the data from the Testing Protocol completed on May 30, 2012. Norlite is also hopeful to have the requirement for LGF Line Pressure reduced or removed completely to further improve LGF flow efficiencies. Norlite will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvraken@norlitecorp.com.

Sincerely,

*Thomas Van Vranken*

Thomas Van Vranken  
Environmental Manager  
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments  
James Lansing, NYSDEC – CO w/attachments  
Joeseeph Hadersbeck, NYSDEC – R4w/attachments

DCL: 2393



NORLITE CORPORATION  
MACT EXCEEDANCE REPORT - KILN 1  
05/21/12 - 06/05/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
5/21/2012	23:13:49	5/21/2012	23:14:16	0:00:27	87	Malfunction	A Sudden Increase in LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse in the Kiln System That Affected the Rear Chamber System / At No Time Were Fugitive Emissions Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/21/2012	23:14:59	5/21/2012	23:15:38	0:00:39	88	Malfunction	Kiln Operator Did Not Follow the Established Recirculation Procedures to Help Minimize Potential LGF Delivery Problems Which Cuased A Pressure Pulse in the Kiln System That Affected the Rear Chamber System/At No Time Were Fugitive Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Discussed With Operator to Follow Established Procedures to be Followed With the New Piping and Pumping System
5/23/2012	4:47:53	5/23/2012	4:48:40	0:00:47	89	Malfunction	A Sudden Increase in LGF Line Pressure Caused Inconsistent LGF Flows From the Kiln Pump Which Caused the Upper Instrument Setpoint for LGF Flow Span to be Reached	LGF Flow	Span	Adjusted Fuel Flow
5/23/2012	16:30:54	5/23/2012	16:46:13	0:15:19	90	Malfunction	A Sudden Increase in LGF Line Pressure Caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse in the Kiln System That Affected the Rear Chamber System / At No Time Were Fugitive Emissions Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/26/2012	5:41:39	5/26/2012	5:42:01	0:00:22	91	Malfunction	After a Tank Switch, Air Bubbles Got Into the LGF Fuel Line Which Caused the MicroMotion to Have A False Reading	LGF Flow	Span	Flushed Out Air Bubbles In MicroMotion
5/26/2012	5:42:04	5/26/2012	5:42:32	0:00:28	92	Malfunction	After a Tank Switch, Air Bubbles Got Into the LGF Fuel Line Which Caused the MicroMotion to Have A False Reading	LGF Flow	Span	Flushed Out Air Bubbles In MicroMotion
5/26/2012	5:45:28	5/26/2012	5:45:47	0:00:19	93	Malfunction	After a Tank Switch, Air Bubbles Got Into the LGF Fuel Line Which Caused the MicroMotion to Have A False Reading	LGF Flow	Span	Flushed Out Air Bubbles In MicroMotion
5/27/2012	2:28:42	5/27/2012	2:30:19	0:01:37	94	Malfunction	The Stator on the Moyno Pump Swelled and Cauded the Pump to Stop Working, Valve Were Used to Control LGF Flow Which Cuased the Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span to be Reached	LGF Flow	Span	Adjusted Fuel Flow
5/31/2012	13:55:11	5/31/2012	13:59:30	0:04:19	95	Malfunction	The Stator on the Moyno Pump Swelled and Cauded the Pump to Stop Working, Valve Were Used to Control LGF Flow Which Cuased the Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span to be Reached	LGF Flow	Span	Adjusted Fuel Flow



NORLITE CORPORATION  
MACT EXCEEDNACE REPORT - KILN 2  
05/21/12 - 06/05/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
5/21/2012	8:06:38	5/21/2012	8:07:09	0:00:31	253	Malfunction	Mist Pad Water Flow was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/21/2012	9:02:01	5/21/2012	9:02:48	0:00:47	254	Malfunction	Mist Pad Water Flow was Left On After the Kiln Startup Occurred Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Turned Off Mist Pad Water
5/26/2012	5:54:45	5/26/2012	5:55:09	0:00:24	255	Malfunction	A Sudden Increase in LGF Line Pressure caused Inconsistent LGF Flows From the Kiln Pump Which Caused the Upper Instrument Setpoint for LGF Flow Span to be Reached	LGF Flow	Span	Adjusted LGF Line Pressure and Pump Flow
5/26/2012	5:56:01	5/26/2012	5:57:54	0:01:53	256	Malfunction	A Sudden Increase in LGF Line Pressure caused Inconsistent LGF Flows From the Pump Which Caused a Pressure Pulse in the Kiln System that Affected the Rear Chamber System; At No Time Were Fugitive Emissions Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
5/26/2012	17:06:18	5/26/2012	17:09:28	0:03:10	257	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
5/27/2012	3:23:36	5/27/2012	3:24:18	0:00:42	258	Malfunction	The Kiln Operator Was Using Valves to Control LGF Flow Due to High LGF Line Pressure Effecting the Kiln Pump Performance. The Use of Valves Causes a LGF Fuel Surge Which Caused A Pressure Pulse In the System Which Affected the Rear Chamber System/At No Time Were Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjust LGF Line Pressure and LGF Flow
5/27/2012	3:25:54	5/27/2012	4:34:18	1:08:24	259	Malfunction	Previous Back Chamber Cutoff Caused System Instability Which Caused CO's to Rise	Carbon Monoxide	Opl	Adjusted Fuel Flow
5/28/2012	23:43:45	5/28/2012	23:45:20	0:01:35	260	Malfunction	The Kiln Operator Was Using Valves to Control LGF Flow Due to High LGF Line Pressure Effecting the Kiln Pump Performance. The Use of Valves Causes a LGF Fuel Surge Which Caused the Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
5/29/2012	19:21:40	5/29/2012	20:25:56	1:04:16	261	Malfunction	After Recovering the Kiln From a Power Outage, the LGF Pump Quit Which Caused a Loss of Fuel In the Kiln Which Caused a CO spike	Carbon Monoxide	Opl	Re-started Pump and Established Fuel Flow
5/30/2012	19:05:02	5/30/2012	19:05:58	0:00:56	262	Malfunction	The Kiln Operator Was Using Valves to Control LGF Flow Due to High LGF Line Pressure Effecting the Kiln Pump Performance. The Use of Valves Causes a LGF Fuel Surge Which Caused A Pressure Pulse In the System Which Affected the Rear Chamber System/At No Time Were Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjust LGF Line Pressure and LGF Flow

5/30/2012	19:31:32	5/30/2012	19:32:05	0:00:33	263	Malfunction	The Kiln Operator Was Using Valves to Control LGF Flow Due to High LGF Line Pressure Effecting the Kiln Pump Performance. The Use of Valves Causes a LGF Fuel Surge Which Caused A Pressure Pulse In the System Which Affected the Rear Chamber System/At No Time Were Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjust LGF Line Pressure and LGF Flow
5/30/2012	19:40:02	5/30/2012	19:44:58	0:04:56	264	Malfunction	The Kiln Operator Was Using Valves to Control LGF Flow Due to High LGF Line Pressure Effecting the Kiln Pump Performance. The Use of Valves Causes a LGF Fuel Surge Which Caused A Pressure Pulse In the System Which Affected the Rear Chamber System/At No Time Were Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjust LGF Line Pressure and LGF Flow
5/30/2012	23:44:03	5/30/2012	23:44:32	0:00:29	265	Malfunction	The Kiln Operator Was Using Valves to Control LGF Flow Due to High LGF Line Pressure Effecting the Kiln Pump Performance. The Use of Valves Causes a LGF Fuel Surge Which Caused A Pressure Pulse In the System Which Affected the Rear Chamber System/At No Time Were Emission Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjust LGF Line Pressure and LGF Flow